

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

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BABY DOE, A CITIZEN OF AFGHANISTAN	:	
CURRENTLY RESIDING IN NORTH	:	CIVIL ACTION NO. 3:22-CV-49
CAROLINA, BY AND THROUGH NEXT	:	
FRIENDS, JOHN AND JANE DOE; AND JOHN	:	
AND JANE DOE, CITIZENS OF AFGHANISTAN:	:	
AND LEGAL GUARDIANS OF BABY DOE,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
JOSHUA MAST, STEPHANIE MAST, RICHARD	:	
MAST, KIMBERLEY MOTLEY, AND AHMAD	:	
OSMANI,	:	
	:	
Defendants,	:	
	:	
and	:	
	:	
UNITED STATES SECRETARY OF STATE	:	
ANTONY BLINKEN AND UNITED STATES	:	
SECRETARY OF DEFENSE GENERAL	:	
LLOYD AUSTIN,	:	
	:	
Nominal Defendants.	:	

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**PLAINTIFFS' MOTION TO SEAL EXHIBITS 1-5 TO PLAINTIFFS' OPPOSITION
TO DEFENDANT RICHARD MAST'S MOTION AND MEMORANDUM IN SUPPORT
OF ORDER DIRECTING CLERK TO REQUEST INFORMATION HELD BY
A VIRGINIA CIRCUIT COURT**

Plaintiffs, by counsel, respectfully move for leave to file Exhibits 1-5 to Plaintiffs' Opposition to Defendant Richard Mast's Motion and Memorandum in Support of Order Directing Clerk to Request Information Held by a Virginia Circuit Court under seal, pursuant to Local Civil

Rule 9. The Exhibits sought to be filed under seal are being filed electronically with the Court contemporaneously herewith, as required by Local Civil Rule 9. As further grounds for this motion, Plaintiffs refer to the Memorandum in Support of this Motion, filed contemporaneously herewith. A proposed Order is attached..

Dated: March 14, 2023

Respectfully submitted,

/s/ Maya Eckstein

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of March 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing to all CM/ECF participants.

By: /s/ Maya M. Eckstein
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